

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

FELICIA ALTERESCU,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF
EDUCATION; RICHARD CARRANZA,
CHANCELLOR; and THE UNITED FEDERATION
OF TEACHERS,

Defendants.

----- X

21-CV-00925 (KPF)

**DOE DEFENDANTS’
NOTICE OF MOTION
TO DISMISS
PLAINTIFF’S SECOND
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the Declaration of Lauren A. Rosenfeld, dated October 6, 2021, the exhibits thereto, the memorandum of law in support of DOE Defendants’ motion to dismiss the second amended complaint, dated October 6, 2021, and upon all the papers and proceedings previously had herein, Defendants New York City Department of Education and Richard Carranza (collectively “DOE Defendants”) will move this Court at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, before the Honorable Katherine Polk Failla, United States District Judge, at such time as the Court may deem fit to hear the parties, for a judgment, pursuant to Federal Civil Procedure Rule 12(b)(6), dismissing the second amended complaint with prejudice against DOE Defendants and granting DOE Defendants such other and further relief that this Court deems just and proper.

Date: New York, New York
October 6, 2021

GEORGIA M. PESTANA
Corporation Counsel of the
City of New York
Attorney for DOE Defendants
100 Church Street, Room 2-109(C)
New York, New York 10007
(212) 356-3574
lrosenfe@law.nyc.gov

By: /s/ *Lauren A. Rosenfeld*
Lauren A. Rosenfeld
Assistant Corporation Counsel

Civil Action No. 21-cv-04051 (JPO) (SN)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROSARIO M. DE LA ROSA ,

Plaintiff,

-against-

THE NEW YORK CITY DEPARTMENT OF
EDUCATION ET AL.,

Defendants.

**NOTICE OF MOTION TO DISMISS THE
AMENDED COMPLAINT**

GEORGIA M. PESTANA

*Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street, Room 2-109(g)
New York, New York 10007*

*Of Counsel: Rachel M. DiBenedetto
Donna A. Canfield
Tel: (212) 356-5031*

Due and timely service is hereby admitted.

New York, N.Y.

.....Esq.

Attorney for Defendants.....